

## E-MAIL MANAGEMENT

E-mail messages—both sent and received—that provide evidence of a government transaction are considered public records. Agencies and locality Records Officers must ensure that e-mail is organized for convenient retrieval, maintained and disposed of in accordance with an approved Records Retention and Disposition Schedule, and accessible as technology is upgraded or changed. The effort to develop and implement an e-mail management policy is the responsibility of each agency or locality and involves a cooperative effort between records management staff, administration, legal counsel, and information technology departments. While IT is necessarily involved in many aspects of records management, such as server maintenance and destruction of backup tapes, creation and dissemination of e-mail management policy is the responsibility of the Records Officer.

Some examples of public record e-mails include policies and directives, correspondence or memos pertaining to the organization's business, work schedules and assignments, documents circulated for approval or comment, and any message that initiates, authorizes, or completes a business transaction, final report, or recommendation. Not all e-mail messages, however, are considered public records. Personal messages or announcements, courtesy or reference copies, routine chat on e-mail listservs, and announcements of social events are all examples of nonrecord e-mail correspondence. These lists are by no means inclusive.

E-mail messages are subject to the same retention requirements as all other records. This means that there are no set retention periods for e-mails as a format type. Instead, retention periods for e-mail vary according to the information contained within the message as well as the function the message performs. As mentioned above, the *Code of Virginia* §42.1-77 defines records by their content, not their format. E-mail, like paper, is a format. The life cycle of a record is determined by its Records Retention and Disposition Schedule. Often e-mail is considered correspondence, which is covered under [General Records Retention and Disposition Schedule \(101\)](#) for state agencies and [General Records Retention and Disposition Schedule \(19\)](#) for localities. For records that are not classified as correspondence, review the appropriate retention schedule to determine the applicable retention and disposition period.

E-mail records are also subject to the same legal requirements regarding access as other government records. In addition, e-mail records are subject to the same accessibility requirements as any other public record, unless they fall within the exemptions provided under FOIA. Requests from the public for e-mail records must be honored in the same manner as other public records. E-mail records, like all other public records, must remain accessible during their

entire retention period and should be maintained in a manner that permits efficient and timely retrieval. Developing a standardized system of document naming and filing, along with planning for indexing and retrieval points, will assist an agency or locality in maintaining the accessibility of all e-mail messages throughout the required retention period.

Some Virginia state agencies have decided to adopt a proactive and collective approach to e-mail retention by adding a common e-mail folder to all of their users' e-mail inboxes. This folder contains subfolders, each labeled with a different record type created by that agency. Users can "drag and drop" e-mail messages that are considered public records into these folders on a daily basis. When an agency's e-mail records reach the end of their retention period, they can easily be transferred to the Archives, Library of Virginia, retained by the agency, or disposed of according to the applicable retention schedules.

More frequently, individuals are personally responsible for the records they create, including e-mails received and sent as well as any attachments. Individuals should be aware of any general or specific retention schedules that apply to their e-mail records and they must file, retain, and dispose of these messages accordingly. Many e-mail programs now include an auto-archiving function, which is not recommended for use, as e-mails are not maintained according to an approved Records Retention and Disposition Schedule. The Library encourages users to archive e-mail manually on a regular basis.

When retaining e-mail, any records management system must take into account the importance of metadata. Without this information, much of the original context in which the record was created is lost. Complete e-mail records must include all of the following elements, most of which are included in the Internet mail header:

- Names and e-mail addresses of recipients, including names and addresses of all members of distribution lists
- Name and e-mail address of sender
- Time and date that the e-mail was sent
- Subject line that describes the content of the e-mail
- Text in the body of the e-mail
- Attachments, if applicable

E-mails may be printed and maintained in paper instead of electronic format; however, all of the information above must be included in the paper copy. Often, two users may send a long string of e-mails to one another about a particular topic. In this case, only the last e-mail in a chain must

be retained as long as the previous e-mail interactions appear as part of the record. This reduces the number of duplicate records and saves server space.

In addition, it is important for agencies and localities to consider e-mail security and develop procedures to provide security for e-mail so that it cannot be altered or deleted intentionally or unintentionally. E-mail records stored online should be backed up regularly to protect them from system failures, tampering, or deletion. Backup procedures should be coordinated to ensure that no copies of e-mail records are maintained after their retention period expires. Records Officers should work with their IT departments to ensure that all copies of a record are destroyed at the end of its retention period.

Records Analysis Services at the Library of Virginia can provide support and e-mail records training for agencies, including how to identify and manage e-mail messages that constitute public records. For more information regarding identifying e-mail records, refer to the e-mail record decision tree below.

## **Practical tips for managing e-mail**

### **1. Clean up your e-mail**

Agency and locality personnel are responsible for managing e-mails, including sent and received messages. The following are suggestions for managing your e-mail:

- Delete e-mails that do not need to be retained as public records, such as out-of-office responses, meeting announcements, and listserv correspondence. Start by performing a search for the following words or phrases: accepted, declined, tentative, out of office, FYI, or meeting.
- It is not always necessary to retain e-mails in which you are not the primary recipient. If an e-mail is **internally** generated and sent to a primary recipient within the agency, the e-mail should be maintained by the primary recipient. The secondary recipients, that is those in the CC line, may filter out and delete the e-mail. If an e-mail is sent from a source **external** to the agency and an individual within the agency is copied, that e-mail may be the only copy within the agency and it should therefore be retained.
- Sort messages by sender for easy identification and purge personal correspondence.
- Retain only the final e-mail in a thread, as long as the entire thread is contained in the final e-mail. Be sure any attachments are also saved.

- Permanently delete items in your Deleted Items folder on a regular basis. You may also bypass the Deleted Items folder and delete items permanently in Outlook by highlighting the appropriate messages and holding down the Shift and Delete keys simultaneously.
- File your e-mail regularly. Once you've read and responded to an e-mail, place it in one of your e-mail folders, or delete it according to the appropriate retention and disposition schedule. Remember to file or delete sent items as well as received items.

## **2. Set up an archiving system**

E-mails should only be stored within e-mail systems temporarily. There are three methods of archiving e-mail communications outside of the e-mail system:

- Create personal folders that are stored outside of your mailbox but can be viewed using your e-mail client. If you store e-mail on your hard drive, be sure to backup the files on a regular basis.
- Store, access, and manage e-mail messages and other electronic records using an Electronic Content Management system (ECM), such as IBM FileNet.
- Print e-mails and maintain them in a manual system. Include names and e-mail addresses of recipients and sender; time and date sent; subject line that describes the content of the e-mail; text; and attachments, if applicable. If an e-mail is sent to a distribution list, include names and addresses of all members of the list.

Regardless of the chosen approach, make sure folders are named and arranged logically, just as they would be in a paper filing system. Organizing archived e-mail in folders according to records series and fiscal or calendar year facilitates the monitoring of records retention and disposition. In addition, never password-protect an e-mail archive, as doing so may result in retrieval issues in the future.

Keep in mind that there is a difference between archiving and AutoArchiving within Microsoft Outlook. Archiving involves a manual transfer by the user and AutoArchiving is an automatic process that, if turned on within Outlook, takes place at regular intervals. Rather than using the AutoArchiving function, users should set aside time to clean up mailboxes and archive appropriate folders manually.

## **3. Dispose of e-mail appropriately**

E-mail, like all other records, may be disposed of in one of two ways: [destruction](#) or transfer to the Archives, Library of Virginia.

E-mail that does not contain confidential or privacy-protected information may be disposed of by deleting it from the e-mail system. For e-mails containing confidential or privacy-protected information, be sure that you electronically shred the e-mail or wipe clean the media on which it resides. E-mail destruction should be reported on a [Certificate of Records Destruction \(RM-3 Form\)](#). Work with your IT department to ensure all duplicate copies, which may reside on servers or backup tapes, are also destroyed.

E-mail may be transferred to the Archives, Library of Virginia on a case-by-case basis by completing the [Records Transfer and Receipt List \(RM-17 Form\)](#).

# E-MAIL RECORD DECISION TREE

